

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF HAWAII

In the Matter of the Application of)	
)	
PUBLIC UTILITIES COMMISSION)	DOCKET NO. 2008-0273
)	
Instituting a Proceeding to Investigate the)	
Implementation of Feed-in Tariffs.)	
)	
)	

**ALEXANDER & BALDWIN, INC. through its division
HAWAIIAN COMMERCIAL & SUGAR COMPANY'S RESPONSES TO
THE SECOND SET OF INFORMATION REQUESTS FROM THE COMMISSION'S
CONSULTANT, THE NATIONAL REGULATORY RESEARCH INSTITUTE**

AND

CERTIFICATE OF SERVICE

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BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF HAWAII

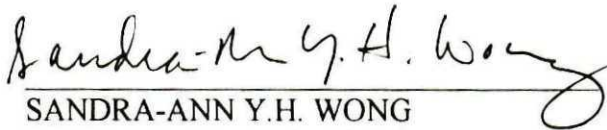
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THE COMMISSION'S CONSULTANT,
THE NATIONAL REGULATORY RESEARCH INSTITUTE**

Pursuant to the Commission's Letter to the Parties, dated March 16, 2009, Alexander & Baldwin, Inc., through its division Hawaiian Commercial & Sugar Company hereby submits the following Responses to The Second Set of Information Requests from the Commission's consultant, the National Regulatory Research Institute.

Respectfully submitted.

DATED: Honolulu, Hawaii, March 30, 2009.


SANDRA-ANN Y.H. WONG
Attorney for Alexander & Baldwin, Inc.
through its division Hawaiian Commercial
& Sugar Company

VII. IRs to Blue Planet Foundation and other parties contributing to the Schedule FiT

- 1. Please provide all documentation, calculations, and other analysis supporting the specific rates proposed on pages 4-9 of the Schedule FiT attached to Blue Planet's Opening Statement.**

Response:

HC&S can only respond as to how the specific rates for Biomass (Non-wood-burning generating facility) were calculated. These rates were based on the feed-in tariff schedule in effect in Germany as of September 2008¹, converted from Euros into US Dollars at the exchange rate of €0.6812:\$1.0000 quoted as of September 23, 2008² and increased by 25% to take into account inflation and the increased cost of doing business in Hawaii. (See response to HECO/HC&S-IR-21.)

¹ The Germany feed-in tariff rates were obtained from the Tables of Renewable Tariffs or Feed-in Tariffs Worldwide published by Wind-Works.org at <http://www.wind-works.org/FeedLaws/TableofRenewableTariffsorFeed-InTariffsWorldwide.html>

² Yahoo! Finance Currency Converter (September 23, 2008).

- 2. To the extent that the specific rates proposed on pages 4-9 of the Schedule Fit attached to Blue Planet's Opening Statement are based on feed-in tariffs in other places, please describe:**

a. Which FiTs are being utilized for each of the proposed FiT rates.

Response:

See response to Question 1 above.

b. Whether the proposed FiTs are the same as those elsewhere, save use of dollars instead of Euros. Please provide the exchange rate used to make such calculations.

Response:

See response to Question 1 above.

c. The basis for any non-exchange rate adjustments from the FiT rates elsewhere.

Response:

See response to Question 1 above.

3. **Please explain why the queuing procedures in Midwest ISO are preferavble to those of other transmission organizations. Please list the essential elements of the Midwest ISO queuing procedures that you support Hawaii adopting.**

Response:

Besides the Midwest ISO, HC&S is not familiar with any other queuing system. HC&S was introduced to the Midwest ISO by Zero Emissions Leasing, LLC.

Please See HC&S' response to HECO/HC&S-IR-19.

- 4. Why is 20 years the appropriate time period for FiT agreements? Provide all underlying calculations, workpapers, reports or other information supporting FiT agreements lasting 20 years**

Response:

See Response to HECO/HC&S-IR-17.

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The foregoing Responses to Information Requests were served on the date of filing by
hand delivery or electronically transmitted to the following Parties:

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